

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ILLINOIS
COMMERCE COMMISSION
Feb 28 2 15 PM '00
CHIEF CLERK'S OFFICE

IN THE MATTER OF)

CONSUMERS GAS COMPANY)

Petition Pursuant to §7-101 of)
The Public Utilities Act seeking authority)
to enter agreements for employment of an)
engineering company in which an affiliated)
interest exists.)

Docket No.: 00-

0575

PETITION

To the Illinois Commerce Commission:

1. Petitioner, CONSUMERS GAS COMPANY (hereafter "Consumers" or "Petitioner"), respectfully shows that it is a corporation duly organized and existing under the laws of the State of Illinois and is engaged in the distribution and sale of natural gas to the public in the State of Illinois. Consumers serves approximately 6,000 customers, counting the Shawneetown and Equality, Illinois, municipal systems each as one customer.

2. It is a public utility within the meaning of an Act entitled, "The Public Utilities Act" (220 ILCS 5/1-101, et seq.) (the "Act"), now in force in Illinois and is subject to the jurisdiction of this Commission.

3. C.A. Robinson is a shareholder, director and officer of each of Robinson Engineering & Oil Company, Inc., an Indiana Corporation (hereinafter "Robinson Engineering") and of Consumers.

4. On July 14, 1992, Petitioner filed a verified Petition pursuant to § 7-101 of the Act seeking consent to the execution and performance by Petitioner of a Map Preparation Agreement and an Engineering Services Agreement. The Petition was assigned Docket Number 92-0253 and on January 27, 1993, an Order, a true and correct copy of which is attached hereto as Exhibit "A", was entered in said docket.

5. The Map Preparation Agreement referred to in Exhibit "A" was effective for a period of 3 years from January 27, 1993, and provided for the expenditure of a maximum of \$45300.00 for performance of the services required under the Map Preparation Agreement.

6. Robinson Engineering and Consumers were not, for various reasons, able to complete the services as provided in the Map Preparation Agreement and the work completed resulted in an expenditure of \$13,100.00 of the maximum permitted expenditure of \$45,300.00.

7. The mapping work contemplated to be done in Docket 92-0253, and as permitted by Exhibit "A" remains necessary for the proper operation of Petitioner. Petitioner and Robinson Engineering are now positioned to complete the mapping work if said work and related costs are approved by this Commission..

8. In addition to the contemplated completion of the mapping services, as above-described, it will be necessary for Consumers to maintain the maps on a current basis and the expected cost of such annual maintenance is anticipated to be not more than \$5,000.00 annually.

9. Attached hereto as Exhibit "B" is a form of Map Preparation Agreement II, which Petitioner seeks authority to execute, setting forth the obligations and responsibility of Petitioner and Robinson Engineering to each other relative to the services to be provided for preparation and maintenance of the above-described computer maps.

10. In addition to the services it anticipates providing in preparation of the described computer maps, Robinson Engineering has in the past, and will in the future, performed other engineering services on an "as needed" basis for Consumers for which it seeks future compensation.

11. Attached hereto as Exhibit "C" is a form of Engineering Services Agreement II, which Petitioner seeks authority to execute, setting forth the obligations and responsibilities of Petitioner and Robinson Engineering to each other relative to the incidental engineering services to be provided. .

12. The ownership and officers of Consumers and Robinson Engineering are such that an affiliated interest exists as defined in §7-101 of the Act.

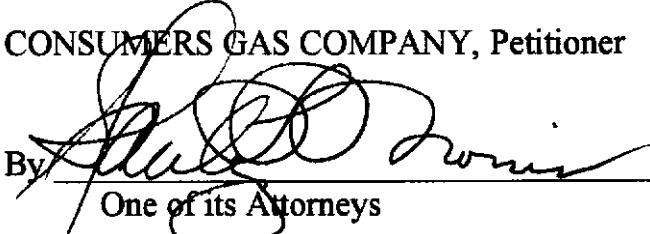
WHEREFORE, all for the reasons stated above, Consumers prays that the Commission enter an Order providing the following:

A. Authority to execute a Map Preparation Agreement II for the employment of Robinson Engineering & Oil Company, Inc., to provide engineering services for the completion of preparation of computer maps of the gas lines and meter connections in all municipalities served by Consumers Gas Company in an amount not to exceed \$32,200.00 and for annual maintenance of said computer maps in an amount not to exceed \$5,000; and

B. Authority to execute an Engineering Services Agreement II for the employment of Robinson Engineering & Oil Company, Inc., to provide other required incidental engineering services to Consumers Gas Company.

Respectfully submitted,

CONSUMERS GAS COMPANY, Petitioner

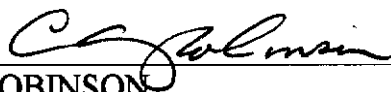
By 
One of its Attorneys

Stanley L. Morris
Reg. No. 6184790
Quinn, Johnston, Henderson & Pretorius
3 North Old State Capitol Plaza
Springfield, Illinois 62701
Telephone: 217-753-1133
Facsimile: 217-753-1180
E-mail: Smorris@QJHP.com

STATE OF INDIANA)
) ss.
COUNTY OF VANDERBURCH)

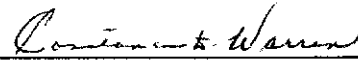
VERIFICATION

C. A. Robinson, being first duly sworn, deposes and says that he is the president of Consumers Gas Company; that he has read the foregoing Petition; that the facts and matters set forth therein are true to the best of his knowledge and belief; that he is authorized to execute this Verification on behalf of Consumers Gas Company.



C. A. ROBINSON

SUBSCRIBED and SWORN to before me, a notary public, this 28 day of July, 2000.



Notary Public
My commission expires June 21, 2007